

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KEDWIN PAYAMPS

Plaintiff(s),

-against-

THE CITY OF NEW YORK ET AL.

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

22 Civ. 0563 (AMD) (VMS)

Defendant(s).
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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): M.K. Kaishian, Cohen Green, 1639 Centre St., Ridgewood, NY 11385

For Defendant(s): Michael Pesin-Virovets, New York City Law Department

- A. Do the parties request referral to the Court's ADR program? Yes: ☐ No: ☒
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?
Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: ☒ If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by 08/10/2022 . Defendant(s) will respond by 08/24/2022 .
- D. Defendant(s) will answer or otherwise respond to complaint by _____, if not yet done.

The parties will serve Rule 26(a)(1) initial disclosures by 08/10/2022 , if not yet done.

The parties will serve initial document requests and interrogatories on or before 08/10/2022 .

Any joinder and/or amendments of the pleadings must be made by 08/27/2022 .

The parties will complete fact discovery by 01/27/2023 .

If the parties perform expert discovery, they will serve initial disclosures by 01/27/2023 ; initial expert reports by 02/27/2023 ; and rebuttal expert reports on or before 04/28/2023 . All discovery, including expert depositions, will be completed by 05/29/2023 , and the parties will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for electronic discovery or confidentiality order:

On 6/27/2022, defendant City filed an Answer on behalf of all named defendants except defendant Jesse Lance, who this Office will not represent. Defendant City requested that the Court grant defendant Lance until 7/27/2022 to secure representation and answer the complaint.